REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed April 10, 2006. Claims 1-18 remain pending in the present application. Reconsideration and allowance of the application and pending claims are respectfully requested.

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1. **Response to Rejections of Claims under 35 U.S.C. § 103**

In the Office Action, claims 1-18 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over *Barnard* (U.S. Patent Publication No. 2003/0005097) in view of *DeBry* (U.S. Patent No. 6,385,728). It is well-established at law that, for a proper rejection of a claim under 35 U.S.C. § 103 as being obvious based upon a combination of references, the cited combination of references must disclose, teach, or suggest, either implicitly or explicitly, all elements/features/steps of the claim at issue. *See, e.g., In Re Dow Chemical*, 5 U.S.P.Q.2d 1529, 1531 (Fed. Cir. 1988), and *In re Keller*, 208 U.S.P.Q.2d 871, 881 (C.C.P.A. 1981).

   a. **Claims 1-5**

As provided in independent claim 1, Applicants claim:

A print server, for processing a print job sent by a workstation, the print server comprising:
a printer set-up module to provide a print driver for installation on the workstation; and
an authentication module to supply an authentication code to the workstation, and to review the print job sent by the workstation to determine validity of a copy of the authentication code attached to the print job.

(Emphasis added).

Applicants respectfully submit that claim 1 is allowable for at least the reason that the proposed combination of *Barnard* in view of *DeBry* does not disclose, teach, or suggest at least "an authentication module to supply an authentication code to the workstation, and to review the print job sent by the workstation to determine validity of a copy of the authentication code attached to the print job," as recited and emphasized above in claim 1.

The Office Action acknowledges that "Barnard does not disclose expressly an authentication module to supply an authentication code to the workstation, and to review the print job sent by the workstation to determine validity of a copy of the authentication code attached to the print job." Page 3. *DeBry* allegedly discloses these features.

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With regard to *DeBry*, it teaches that a "user requesting access would send, 401, such a request to the printer along with the user's digital certificate containing the user's public key. The printer may then send, 402, the public key and the user identification to a certificate authority 60 to authenticate the user's digital certificate." Col. 9, lines 16-20. This digital certificate is "from a trusted authority" which is not the print server that received the request. Accordingly, *DeBry* and *Barnard* fail to teach or suggest a print server having "an authentication module to supply an authentication code to the workstation, and to review the print job sent by the workstation to determine validity of a copy of the authentication code attached to the print job," since a user in neither the *DeBry* or *Barnard* systems receives an authentication code from a print server.

Accordingly, the proposed combination of *Barnard* in view of *DeBry* does not disclose all of the claimed features of claim 1. Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination has not been made, and the rejection of claim 1 and claims 2-5 (which depend from claim 1) should be withdrawn.

b.   Claims 6-9

As provided in independent claim 6, Applicants claim:

> A method of printing, comprising:
> attaching a workstation to a LAN;
> downloading and installing a print driver on the workstation;
> *downloading an authentication code to the workstation from a print server;*
> *sending a print job, containing the authentication code, from the workstation to the print server;*
> *verifying validity of the authentication code;* and
> sending the print job from the print server to a printer.

(Emphasis added).

Applicants respectfully submit that claim 6 is allowable for at least the reason that the proposed combination of *Barnard* in view of *DeBry* does not disclose, teach, or suggest at least "downloading an authentication code to the workstation from a print server; sending a print job, containing the authentication code, from the workstation to the print server; [and] verifying validity of the authentication code," as recited and emphasized above in claim 6.

The Office Action acknowledges that "Barnard does not disclose expressly an authentication module to supply an authentication code to the workstation, and to review the

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print job sent by the workstation to determine validity of a copy of the authentication code attached to the print job." Page 3. *DeBry* allegedly discloses these features.

With regard to *DeBry*, it teaches that a "user requesting access would send, 401, such a request to the printer along with the user's digital certificate containing the user's public key. The printer may then send, 402, the public key and the user identification to a certificate authority 60 to authenticate the user's digital certificate." Col. 9, lines 16-20. This digital certificate is "from a trusted authority" which is not the print server that received the request. Accordingly, *DeBry* and *Barnard* fail to teach or suggest at least "downloading an authentication code to the workstation from a print server; sending a print job, containing the authentication code, from the workstation to the print server; [and] verifying validity of the authentication code," since a user in neither the *DeBry* or *Barnard* systems receives an authentication code from a print server.

Accordingly, the proposed combination of *Barnard* in view of *DeBry* does not disclose all of the claimed features of claim 6. Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination has not been made, and the rejection of claim 6 and claims 7-9 (which depend from claim 6) should be withdrawn.

b. Claims 10-12

As provided in independent claim 10, Applicants claim:

> A method of authenticating a print job, comprising:
> downloading and installing a print driver on a workstation;
> *downloading an authentication code to the workstation from a print server;*
> *sending a print job, containing the authentication code, from the workstation to the print server;*
> *verifying validity of the authentication code;* and
> sending the print job to a printer.

(Emphasis added).

Applicants respectfully submit that claim 10 is allowable for at least the reason that the proposed combination of *Barnard* in view of *DeBry* does not disclose, teach, or suggest at least "downloading an authentication code to the workstation; sending a print job, containing the authentication code, from the workstation to a print server; [and]verifying validity of the authentication code," as recited and emphasized above in claim 10.

The Office Action acknowledges that "Barnard does not disclose expressly an authentication module to supply an authentication code to the workstation, and to review the

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print job sent by the workstation to determine validity of a copy of the authentication code attached to the print job." Page 3. *DeBry* allegedly discloses these features.

With regard to *DeBry*, it teaches that a "user requesting access would send, 401, such a request to the printer along with the user's digital certificate containing the user's public key. The printer may then send, 402, the public key and the user identification to a certificate authority 60 to authenticate the user's digital certificate." Col. 9, lines 16-20. This digital certificate is "from a trusted authority" which is not the print server that received the request. Accordingly, *DeBry* and *Barnard* fail to teach or suggest at least "downloading an authentication code to the workstation; sending a print job, containing the authentication code, from the workstation to a print server; [and]verifying validity of the authentication code," since a user in neither the *DeBry* or *Barnard* systems receives an authentication code from a print server.

Accordingly, the proposed combination of *Barnard* in view of *DeBry* does not disclose all of the claimed features of claim 10. Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination has not been made, and the rejection of claim 10 and claims 11-12 (which depend from claim 10) should be withdrawn.

d.   Claims 13-17

As provided in independent claim 13, Applicants claim:

> A processor-readable medium having processor-executable
> instructions thereon which, when executed by a computer, cause the
> computer to:
> download and install a print driver on a workstation;
> *download and install an authentication code on the workstation
> from a print server;*
> *send a print job, containing the authentication code, from the
> workstation to the print server;*
> *verify validity of the authentication code using an authentication
> module on the print server;* and
> send the print job from the print server to a printer.

(Emphasis added).

Applicants respectfully submit that claim 13 is allowable for at least the reason that the proposed combination of *Barnard* in view of *DeBry* does not disclose, teach, or suggest at least "download and install an authentication code on the workstation from a print server; send a print job, containing the authentication code, from the workstation to the print server; verify

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validity of the authentication code using an authentication module on the print server," as recited and emphasized above in claim 13.

The Office Action acknowledges that "Barnard does not disclose expressly an authentication module to supply an authentication code to the workstation, and to review the print job sent by the workstation to determine validity of a copy of the authentication code attached to the print job." Page 3. *DeBry* allegedly discloses these features.

With regard to *DeBry*, it teaches that a "user requesting access would send, 401, such a request to the printer along with the user's digital certificate containing the user's public key. The printer may then send, 402, the public key and the user identification to a certificate authority 60 to authenticate the user's digital certificate." Col. 9, lines 16-20. This digital certificate is "from a trusted authority" which is not the print server that received the request. Accordingly, *DeBry* and *Barnard* fail to teach or suggest at least "download and install an authentication code on the workstation from a print server; send a print job, containing the authentication code, from the workstation to the print server; verify validity of the authentication code using an authentication module on the print server," since a user in neither the *DeBry* or *Barnard* systems receives an authentication code from a print server.

Accordingly, the proposed combination of *Barnard* in view of *DeBry* does not disclose all of the claimed features of claim 13. Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination has not been made, and the rejection of claim 13 and claims 14-17 (which depend from claim 13) should be withdrawn.

e. **Claim 18**

As provided in independent claim 18, Applicants claim:

> A print server, comprising:
> a printer set-up module to provide a print driver for installation on a workstation; and
> *an authentication module to supply an authentication code to the workstation, and to review a print job processed by the print driver and sent from the workstation to determine validity of the authentication code attached to the print job.*

(Emphasis added).

Applicants respectfully submit that claim 18 is allowable for at least the reason that the proposed combination of *Barnard* in view of *DeBry* does not disclose, teach, or suggest at least "an authentication module to supply an authentication code to the workstation, and to review

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a print job processed by the print driver and sent from the workstation to determine validity of the authentication code attached to the print job," as recited and emphasized above in claim 18.

The Office Action acknowledges that "Barnard does not disclose expressly an authentication module to supply an authentication code to the workstation, and to review the print job sent by the workstation to determine validity of a copy of the authentication code attached to the print job." Page 3. *DeBry* allegedly discloses these features.

With regard to *DeBry*, it teaches that a "user requesting access would send, 401, such a request to the printer along with the user's digital certificate containing the user's public key. The printer may then send, 402, the public key and the user identification to a certificate authority 60 to authenticate the user's digital certificate." Col. 9, lines 16-20. This digital certificate is "from a trusted authority" which is not the print server that received the request. Accordingly, *DeBry* and *Barnard* fail to teach or suggest at least a print server having "an authentication module to supply an authentication code to the workstation, and to review a print job processed by the print driver and sent from the workstation to determine validity of the authentication code attached to the print job," since a user in neither the *DeBry* or *Barnard* systems receives an authentication code from a print server.

Accordingly, the proposed combination of *Barnard* in view of *DeBry* does not disclose all of the claimed features of claim 18. Therefore, a *prima facie* case establishing an obviousness rejection by the proposed combination has not been made, and the rejection of claim 18 should be withdrawn.

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CONCLUSION

For at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

Respectfully submitted,

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